

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**TYRONE HENDERSON, *et al.***

**Plaintiffs,**

**v.**

**Civil Action No. 3:12cv97 (REP)**

**CORELOGIC NATIONAL BACKGROUND DATA, LLC**

**Defendant.**

**DEFENDANT’S MOTION TO FILE CERTAIN EXHIBITS AND INFORMATION IN  
PLAINTIFF’S MOTION FOR CLASS CERTIFICATION UNDER SEAL**

Defendant, CoreLogic National Background Data, LLC (“NBD”), by counsel, and pursuant to Rule 5 of the Local Rules of the United States District Court for the Eastern District of Virginia, submits this Motion to File Certain Exhibits and Information in Plaintiffs’ Motion for Class Certification Under Seal.

In particular, after meeting and conferring on the issue, to the extent that such materials are ultimately attached to or referenced in Plaintiff’s Motion for Class Certification or the related memorandum, NBD will seek to place under seal the following documents that were produced in discovery and marked as “Confidential,” along with any description of the information that is contained in those documents: CL-H0005-6; CL-H-00299; CL-H00546-581; CL-H02518-2525; CL-H02569-2577; CL-H02673-2678; CL-H02711-2712; CL-H02718; CL-H02721-2739; CL-H02950; CL-H07708; CL-H10000-10002/10006; CL-H10043-10093; CL-H10100-10102; CL-H10105-10107; CL-H10113-10115; CL-H10147-10191; CL-H10794; CL-H78976; CL-H92992-92995; CL-H94152-94158; and CL-H92986-92987. NBD will also seek to have placed under seal its responses to Plaintiffs’ First Set of Interrogatory Nos. 2, 4, 6, 13, 17, and 25, including as supplemented, as well as any affidavit that is submitted by any employee of McGladrey, LLP describing the contents of the computer systems at issue.

Under the terms of the Stipulated Protective and Non-Waiver Order entered in this case, NBD will file a non-confidential memorandum within five days of Plaintiffs' filing, which will also note where Plaintiffs have not objected to such proposed sealing.

**CORELOGIC NATIONAL BACKGROUND  
DATA, LLC f/k/a NATIONAL BACKGROUND  
DATA, LLC**

By: /s/ David. N. Anthony

Of Counsel

Alan D. Wingfield (VSB No. 27489)  
David N. Anthony (VSB No. 31696)  
Timothy J. St. George (VSB No. 77349)  
TROUTMAN SANDERS LLP  
1001 Haxall Point  
Richmond, Virginia 23219  
Telephone: (804) 697-1200  
Facsimile: (804) 698-1339  
alan.wingfield@troutmansanders.com  
david.anthony@troutmansanders.com  
tim.stgeorge@troutmansanders.com

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of January 2014, I filed a true and correct copy of the foregoing on ECF, which will send a notice of electronic filing to:

Leonard A. Bennett, Esq.  
Susan M. Rotkis, Esq.  
CONSUMER LITIGATION ASSOCIATES, P.C.  
763 J. Clyde Morris Blvd, Suite 1A  
Newport News, VA 23601  
Telephone: (757) 930-3660  
Facsimile: (757) 930-3662  
Email: lenbennett@cox.net

*Counsel for Plaintiffs*

Janelle E. Mason, Esq.  
Matthew J. Erasquin, Esq.  
CONSUMER LITIGATION ASSOCIATES, P.C.  
1800 Diagonal Rd  
Suite 600  
Alexandria, VA 22314  
Telephone: (703) 273-7770  
Facsimile: (888) 892-3512  
Email: janelle@clalegal.com  
Email: matt@clalegal.com

*Counsel for Plaintiffs*

Dale W. Pittman, Esq.  
THE LAW OFFICE OF DALE W.  
PITTMAN, P.C.  
The Eliza Spotswood House  
112-A West Tabb St.  
Petersburg, VA 23803  
Telephone: (804) 861-6000  
Facsimile: (804) 861-3362  
Email: dale@pittmanlawoffice.com

*Counsel for Plaintiffs*

James Arthur Francis, Esq.  
David A. Searles, Esq.  
FRANCIS & MAILMAN PC  
Land Title Building  
100 S Broad Street, 19th Floor  
Philadelphia, PA 19110  
Telephone: 215-735-8600  
Facsimile: 215-940-8000  
Email: jfrancis@consumerlawfirm.com

*Counsel for Plaintiffs*

/s/ David N. Anthony

David N. Anthony (VSB Bar No. 31696)  
TROUTMAN SANDERS LLP  
1001 Haxall Point  
Richmond, Virginia 23219  
Telephone: (804) 697-1254  
Facsimile: (804) 698-6013  
david.anthony@troutmansanders.com